

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

ANTHONY RICKETTS)
Plaintiff,)
v.) Civil Action No. 1:20-cv-01541
KSJ & ASSOCIATES, INC.)
Defendant.)

DEFENDANT'S OBJECTIONS TO PLAINTIFF'S TRIAL EXHIBITS

KSJ & ASSOCIATES, INC. (“Defendant”), by and through counsel, KIERNAN TREBACH LLP, states as follows as and for its objections to Plaintiff’s proposed trial exhibits:

1. Defendant objects to all proposed trial exhibits that are not documents produced by Defendant on the basis of authenticity, best evidence and/or as duplicative and demands that all exhibits be authenticated at trial. Those documents are identified by Plaintiff as follows:

- a. Exhibit Z
- b. Exhibit DD
- c. Exhibit LL
- d. Exhibit MM
- e. Exhibit SS

2. Defendant objects to all proposed trial exhibits that are not best evidence and/or that seek to provide evidence available from original sources/witnesses subject to appearance/subpoena at trial. Those documents are identified by Plaintiff as follows:

- a. Exhibit NN

b. Exhibit OO

c. Exhibit PP

d. Exhibit QQ.

3. Defendant reserves its rights to object to Plaintiff's exhibits at trial on the grounds of foundation, relevance, Fed. R. Civ. P. 403, admissibility and any other basis as trial of this matter proceeds.

Dated: August 13, 2021

Respectfully submitted,

KSJ & ASSOCIATES, INC.

By Counsel

KIERNAN TREBACH LLP

/S/ Alan S. Block

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Objections to Plaintiff's Exhibit List was served via e-mail and ECF on this 13th day of August, 2021 upon:

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/S/ Alan S. Block

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